1 ISMAIL RAMSEY (Bar No. 189820) izzy@ramsey-ehrlich.com KATHARINE KATES ((Bar No. 155534) 2 katharine@ramsey-ehrlich.com RAMSEY & EHŘLICH LLP 3 803 Hearst Avenue Berkeley, CA 94710 (510) 548-3600 (Tel) (510) 291-3060 (Fax) 5 6 Attorneys for Defendant Mohammed Nuru 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 12 Case No.: CR 20-70028 MAG UNITED STATES OF AMERICA. Case No.: CR 20-70076 MAG 13 Plaintiff, STIPULATION AND [PROPOSED] ORDER TO MODIFY BAIL 14 VS. **CONDITIONS** 15 MOHAMMED NURU, 16 Defendant. 17 18 The defendant Mohammed Nuru is currently scheduled to appear before this Court for 19 status and preliminary hearing or indictment on October 8, 2020 at 10:30 am. 20 This court has previously ordered Mr. Nuru released on bail, with a \$2 million bond, with 21 \$400,000 of that amount secured by a deed of trust on his primary residence. 22 Mr. Nuru has complied with all of the terms of his pretrial release and supervision, 23 without any violations. Mr. Nuru has requested to travel to his home in Stonyford, Colusa 24 County, to perform maintenance for the weekends of September 3, 2020 to September 7, 2020 25 and October 29, 2020 to November 2, 2020. His supervising pretrial services officer does not 26 object to this request. 27 28

Accordingly, the United States and Mr. Nuru stipulate and move this court to modify the 1 bail conditions to allow Mr. Nuru to travel to his home in Stonyford for the two above-described 2 periods. 3 All other conditions of Mr. Nuru's pretrial release, imposed on January 28, 2020, will 4 remain the same. 5 IT IS SO STIPULATED. 6 Dated: August 31, 2020 Respectfully Submitted, 7 8 **RAMSEY & EHRLICH LLP** 9 //s// 10 ISMAIL RAMSEY KATHARINE KATES 11 Attorneys for MOHAMMED NURU 12 DAVID L. ANDERSON 13 **United States Attorney** 14 //s// 15 SCOTT D. JOINER S. WAQAR HASIB 16 **Assistant United States Attorneys** 17 18 GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED. 19 Dated: 20 21 THE HONORABLE SALLIE KIM 22 UNITED STATES MAGISTRATE JUDGE 23 24 25 26 27 28 2